

# **APPENDIX**

**Summary Chart of Deficiencies with Plaintiffs' Proposed Discovery**

In presenting the summary below of the deficiencies in Plaintiffs' Proposed Jurisdictional Discovery Plan (Dkt. 408), Defendants do not waive any objection to discovery, including discovery actually authorized to be sought, or to the admissibility of evidence on the grounds of relevance, materiality, privilege, competency, or any other appropriate ground.

<b>Plaintiffs' Request</b>	<b>Past Conduct</b>	<b>Cumulative/ Duplicative</b>	<b>Improper Deposition</b>	<b>Rule 33 Limit</b>	<b>Rule 45 Nonparties</b>
<b>Interrogatory 1</b> to NIH and NIAID re: Bhattacharya, Kulldorff, and Great Barrington Declaration	x	x		x	
<b>Interrogatory 2</b> to DHS re: EIP, Hoft, and Gateway Pundit	x	x		x	
<b>Interrogatory 3</b> to CISA re: Hoft and Gateway Pundit	x	x		x	
<b>Interrogatory 4</b> to FBI re: Hoft and Gateway Pundit	x			x	
<b>Interrogatory 5</b> to former White House COVID Advisor re: Great Barrington Declaration	x			x	x
<b>Interrogatory 6</b> to State Department employee Ruppe and contractor Beebe re: EIP	x			x	
<b>Interrogatory 7</b> to EIP members re: ties to Government agencies	x			x	x
<b>Interrogatory 8</b> to Center for Countering Digital Hate re: Hoft and Gateway Pundit	x			x	x
<b>Interrogatory 9</b> to Keutsch of Boston University and Roberts of New England Biolabs re: "lab-leak theory"	x			x	x
<b>Interrogatory 10</b> to former NIH Senior Advisor Wolinetz re: "gain of function" research	x			x	x
<b>RFP 12</b> to social media platforms re: Government influence on user policies	x	x			x

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<b>RFP 13</b> to private Gmail accounts re: “censorship” of Plaintiffs	X				X
<b>RFP 14</b> to private email servers re: “inappropriately directed emails”	X				X
<b>RFP 15</b> to private individuals re: “relevant emails”	X				X
<b>RFP 16</b> to CDC re: “censorship” of Plaintiffs Kulldorff and Bhattacharya	X	X			
<b>RFP 17</b> to HHS re: “censorship” of individual Plaintiffs	X	X			
<b>Deposition 19</b> of five social media platforms	X				X
<b>Deposition 20</b> of Virality Project	X				X
<b>Deposition 21</b> of three EIP members	X				X
<b>Deposition 22(a)</b> of former CDC Director Walensky	X	X	X		X
<b>Deposition 22(b)</b> of former CDC Director Redfield	X	X	X		X
<b>Deposition 22(c)</b> of former CDC Social Media Team Lead Dempsey	X	X			
<b>Deposition 22(d)</b> of private individual Ralph Baric	X				X
<b>Deposition 22(e)</b> of former NIAID Director Auchincloss	X	X			X
<b>Deposition 22(f)</b> of former NIH Supervisory Government Information Specialist Moore	X				
<b>Deposition 22(g)</b> of NIAID employee David Morens	X				
<b>Deposition 22(h)</b> of private individual Peter Daszak	X				X
<b>Deposition 22(i)</b> of former White House Director of Digital Strategy Flaherty	X	X	X		X

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<b>Deposition 22(j)</b> of former White House COVID-19 Advisor Slavitt	X	X	X		X
<b>Deposition 22(k)</b> of former Surgeon General Senior Advisor Fullenwider	X	X	X		
<b>Deposition 22(l)</b> of former CISA "Digital Director" Protentis	X	X	X		
<b>Deposition 22(m)</b> of CISA Director Easterly	X	X	X		
<b>Deposition 22(n)</b> of DHS Undersecretary Silvers	X	X	X		
<b>Deposition 22(o)</b> of former CISA Senior Cybersecurity Advisor Masterson	X	X			X
<b>Deposition 22(p)</b> of former Disinformation Governance Board Director Jankowicz	X	X			X
<b>Deposition 22(q)</b> of former White House Communications Director Bedingfield	X	X	X		X
<b>Deposition 22(r)</b> of FBI employee Dehmlow	X	X			